

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. RENÉE MARIE BUMB
THIS DOCUMENT RELATES TO: <i>Roberts v. Zhejiang Huahai Pharmaceutical Co. Ltd.,</i> Case No. 1:19-md-02875-RMB-SAK	

**PLAINTIFFS' NOTICE OF *DAUBERT* MOTION TO PRECLUDE
OPINIONS OF DEFENSE EXPERT ANDREW THOMPSON, PH.D.**

TO: Jessica Davidson
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Attorneys for Defendants

PLEASE TAKE NOTICE that Plaintiffs shall move before the Honorable Renée Marie Bumb, C.U.S.D.J., at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Precluding the Opinions of Defense Expert Andrew Thompson, Ph.D.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief and Certification of Adam M. Slater in support of the Motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: May 22, 2025

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I electronically filed the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: May 22, 2025